

# **EXHIBIT D**

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THEFACEBOOK, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA CLARA

THEFACEBOOK, INC.,  
Plaintiff,

v.

CONNECTU LLC, CAMERON  
WINKLEVOSS, TYLER WINKLEVOSS,  
HOWARD WINKLEVOSS, DIVYA  
NARENDRA, AND DOES 1-25,

Defendants.

CASE NO. 1:05-CV-047381

**THEFACEBOOK, INC.'S FIRST SET  
OF SPECIAL INTERROGATORIES  
TO DEFENDANT CONNECTU**

**PROPOUNDING PARTY:** THEFACEBOOK, INC.

**RESPONDING PARTY:** CONNECTU

**SET NO.:** ONE (NOS. 1-23)

YOU ARE HEREBY REQUESTED, pursuant to California Code of Civil Procedure section 2030, to answer the following interrogatories separately and fully, in writing, and under penalty of perjury, within thirty (30) days after service.

**DEFINITIONS**

A. "ANY" shall be understood to include and encompass "ALL." As used herein, the

**INTERROGATORY NO. 10:**

IDENTIFY the first date YOU knew OR believed that FACEBOOK, its servers, facilities, offices, OR personnel were located in California.

**INTERROGATORY NO. 11:**

IDENTIFY the services provided through the connectu.com website to USERS, including without limitation, how the services are provided.

**INTERROGATORY NO. 12:**

IDENTIFY ALL USERS, including without limitation, their respective email addresses.

**INTERROGATORY NO. 13:**

IDENTIFY the circumstances surrounding the formation AND maintenance of CONNECTU as a limited liability company, including without limitation, filings, investments, COMMUNICATIONS, PERSONS involved, capitalization, directors, officers, attorneys, investors, AND reasons for the formation, as well as organizational meetings, including without limitation meetings of directors, officers, board member, AND Members, Managers AND Board of Managers, as defined in the Limited Liability Company Operating Agreement of ConnectU, LLC – bates numbers C011285 through 011335.

**INTERROGATORY NO. 14:**

IDENTIFY current AND former directors, officers, employees, AND agents of CONNECTU (including without limitation, Members, Managers AND Board of Managers as defined in the Limited Liability Company Operating Agreement of ConnectU, LLC – bates numbers C011285 through 011335), HARVARDCONNECTION, AND WINKLEVOSS COMPANIES, including without limitation, dates in these positions, duties, job descriptions, authorities, AND responsibilities.

**INTERROGATORY NO. 15:**

IDENTIFY ALL of YOUR, HARVARDCONNECTION'S OR WINKLEVOSS COMPANIES' advertising, promotions AND marketing activities directed, at least in part, at California residents.

1 limitation, the dollar amount, the recipient, the reason, AND the date of each Distribution.

2 **INTERROGATORY NO. 22:**

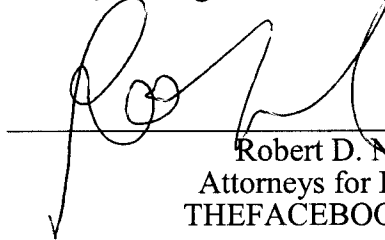
3 IDENTIFY ALL universities, colleges, high schools, AND institutes of higher learning  
4 located in California at which CONNECTU provides OR provided services including without  
5 limitation, access to the connectu.com website, including without limitation University of  
6 California (all campuses), California State University (all campuses), Stanford University, San  
7 Jose State University, Santa Clara University, University of San Francisco, University of  
8 Southern California, University of San Diego, San Diego State University, AND Claremont  
9 Colleges (all campuses), as well as the USERS using email domains (e.g., name@stanford.edu)  
10 from those universities, colleges, high schools, AND institutes of higher learning.

11 **INTERROGATORY NO. 23:**

12 IDENTIFY ALL actions made on behalf of CONNECTU.

13 Dated: November 3, 2005

Orrick, Herrington & Sutcliffe LLP

A handwritten signature in black ink, appearing to read 'Robert D. Nagel', is written over a horizontal line. The signature is stylized with large loops and a long vertical stroke extending downwards.

Robert D. Nagel  
Attorneys for Plaintiff  
THEFACEBOOK, INC.